

Plaintiff will make the records identified above, in 1 (a) through (m), available for inspection and copying to all parties at a mutually convenient time at **SICO HOELSCHER HARRIS LLP**, 3 Riverway, Suite 1910, Houston, Texas 77056.

Plaintiff gives additional notice to all parties of her intent to use the following documents at any pre-trial proceedings and/or at the time of trial:

1. All Business Records Affidavits produced and/or filed by Plaintiff relating to the payments of all medical services and/or care received by Plaintiff from the time of the incident made the basis of this lawsuit, up to and including the date of trial, including but not limited to:
 - a. Medical Records from Christus Hospital – St. Elizabeth;
 - b. Billing Records from Christus Hospital – St. Elizabeth;
 - c. Medical Records “Radiology Films” from Total Care;
 - d. Billing Records from Total Care;
 - e. Medical Records from Total Care;
 - f. Medical Records from Triangle Therapeutics;
 - g. Billing Records from Triangle Therapeutics;
 - h. Medical Records from Beaumont Bone & Joint Institute;
 - i. Billing Records from Beaumont Bone & Joint Institute;
 - j. Medical Records “Radiology Films” from Beaumont Bone & Joint Institute;
 - k. Medical Records from Bridge City Physical Therapy;
 - l. Billing Records from Bridge City Physical Therapy; and
 - m. Radiology films from Bridge City Physical Therapy.
2. All records produced by Plaintiff in this matter, including but not limited to those documents produced by Plaintiff during the pendency of this matter. These records include the medical records identified in 1(a) through (m) and, those documents produced on November 12, 2021, via a dropbox link.
3. All records produced by Defendant in this, including but not limited to those documents produced by Defendant during the pendency of this matter.
4. All correspondence received from defendant and/or Plaintiffs regarding this matter.
5. All photographs created and/or produced by any party or any adjuster or any investigator relating to the incident made the basis of this lawsuit.
6. Any witness statements made at or near the time of the incident made the basis of this lawsuit.

7. Any and all investigative/accident reports relating to the accident made the basis of this lawsuit, including any addendum to the report and any and photographs and/or measurements that are a part of the investigative/accident report.
8. All documents and/or reports produced by Defendant, its employees and/or agents and/or representatives.
9. This notice includes those documents, records and/or reports produced by any and all experts that have been named and/or designated and/or cross-designated by Plaintiffs.
10. All documents produced by any party, including but not limited to, any and all photographs, schematics, drawings, diagrams, videotapes, motion pictures, surveillance movies, surveillance pictures.
11. All depositions that have been taken and/or will be taken in this matter, including but not limited to the depositions of:

Sig Sauer, Inc.
Brittany Hilton
Steven D. Hilton
Sgt. Marvin Reyes
Robert Bergeon
Paul Davis
Richard Teague
Jonathyn W. Priest

Katy Sutton, Ph.D.
Timothy M. Hicks, P.E.
Samantha Piatt
Al LaRochelle
Christopher Meyer
Sean Toner
Derek Watkins

Plaintiff incorporates for all intent and purposes, as if though fully set out above, all depositions that are scheduled for a future date or, which may be scheduled for a future date.

12. All exhibits to all depositions taken in this matter, including those exhibits attached to the depositions of:

Brittany Hilton
Steven D. Hilton
Sgt. Marvin Reyes
Robert Bergeon
Paul Davis
Richard Teague
Jonathyn W. Priest

Katy Sutton, Ph.D.
Timothy M. Hicks, P.E.
Samantha Piatt
Al LaRochelle
Christopher Meyer
Sean Toner
Derek Watkins

Plaintiff incorporates for all intent and purposes, as if though fully set out above, all exhibits to all depositions that are scheduled for a future date or, which may be scheduled for a future date.

13. All pleadings and motions filed in this matter, including but not limited to all attachments as follows:
- All attachments to Defendant's Motions for Summary Judgment; and
 - All attachments to Plaintiff's Responses to Defendant's Motions for Summary Judgment.
14. Plaintiff cross-designates all documents which any party may designate as documents they intend to use during any pre-trial proceedings and/or at the time of trial.
15. Plaintiff reserves the right to use documents needed as rebuttal to any issue brought up by the other parties in this lawsuit.

Plaintiff will make the records identified above, available for inspection and copying to all parties at a mutually convenient time at **SICO HOELSCHER HARRIS LLP**, 3 Riverway, Suite 1910, Houston, Texas 77056.

Respectfully submitted,

/s/ Jeffrey S. Bagnell
Jeffrey S. Bagnell
Federal Bar No. CT18983
Admitted Pro Hac Vice
Jeffrey S. Bagnell, Esq., LLC
55 Post Road West
Westport, CT 06880
(203) 984-8820
jeff@bagnell-law.com

and

SICO HOELSCHER HARRIS LLP

/s/ James H. Hada
James H. Hada
Federal Bar No. 11527
3 Riverway, Suite 1910
Houston, Texas 77056
Office: 713.465.9944
Facsimile: 877.521.5576
E-Mail: jhada@shhlaw.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was provided to all counsel via the e-service portal on this 1st day of December 2022.

/s/ Jeffrey S. Bagnell
Jeffrey S. Bagnell